006 613 Federal Facility Agreement and Consent Order **Change Number Change Control Form** Do not use blue ink. Type or print using black ink. M-20-04-01 February 25, 2004 Phone Originator (509) 372-2400 J. B. Hebdon Class of Change [] I - Project Manager [ ] II - Executive Manager [X] I - Signatories Change Title Integrated Closure of the 1706-KE Waste Treatment System and 303-M Oxide Facility and completion of Major Milestone M-20-00A. **Description/Justification of Change** This change form removes the 1706-KE Waste Treatment System (WTS) and the 303-M Oxide Facility treatment, storage and/or disposal units (TSD) from the scope of Major Milestones M-20-00, M-20-00A and M-20-00B, adds the 1706-KE WTS to the scope of Interim Milestone M-16-52, and modifies Hanford Federal Facility Agreement and Consent Order (Agreement) Appendices B (Listing of TSD Units) and Appendix C (listing of Operable Units and Waste Sites) to reflect current agreements. Specifically, the Agreement is modified by this change form to reflect the agreed closure of the 1706-KE WTS in conjunction with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) cleanup under the 100 Area Remaining Sites Record of Decision. This strategy will allow for an effective use of resources by placing the cleanup activities associated with this facility in a single action. This more efficient approach poses no additional risk in that the present condition of the 1706-KE WTS presents no threat to human health or the environment. In addition, this change request does not alter the scope and schedule of actions required to achieve closure of the 1706-KE WTS. Integrating the closure of the 1706-KE WTS with CERCLA under the terms of the Agreement will be accomplished by adding the four 1706-KE WTS waste sites to Appendix C of the Agreement within the 100-KR-2 Operable Unit and noting this scope under existing Interim Milestone M-16-52. Appendix B is also modified to add the 100-KR-2 as the appropriate operable unit for the 1706-KE WTS. Similarly, fulfillment of closure plan requirements for the 303-M Oxide Facility was transferred to the remediation of the 618-1 Burial Ground waste site within the 300-FF-2 Operable Unit by approved Tri-Party Agreement change request M-20-92-05. Major Milestone M-20-00A is now considered completed with the approval of these actions. Description/justification of change is continued on page 2 of 3. Impact of Change No impact is anticipated as a result of this change. **Affected Documents** Hanford Federal Facility Agreement and Consent Order, as amended EDMC **Approvals** 

4/1/04 V Approved\_

#### The following changes are made to the existing M-20-00 series of Major Milestones.

Note: Struckout text indicates text to be deleted, shaded text indicates text to be added.

NOT CONSISTENT WITH AGREEMENT REQUIREMENTS SHALL NOT BE FINALIZED PRIOR TO APPROVAL OF AN AGREEMENT CHANGE REQUEST SUBMITTED PURSUANT TO AGREEMENT ACTION PLAN SECTION 12.0.  M-020- SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE/POST CLOSURE 00A PLANS FOR ALL RCRA TSD UNITS EXCEPT 216-A-10, 216-A-36B, 216- A-37-1, 207-A SOUTH RETENTION BASIN, 216-S-10 POND, 216-S-10	FINALIZED PRIOR TO APPROVAL OF AN AGREEMENT CHANGE REQUEST SUBMITTED PURSUANT TO AGREEMENT ACTION PLAN SECTION 12.0.  M-020- SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE/POST CLOSURE 02/28/2004	M-020-00 LEAD AGENCY: ECOLOGY	SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE/POSTCLOSURE PLANS FOR ALL RCRA TSD UNITS EXCEPT 303-M OXIDE FACILITY AND 1706-KE WASTE TREATEMENT SYSTEM. PERMIT APPLICATIONS, CLOSURE, AND POST-CLOSURE PLANS WILL BE SUBMITTED TO ECOLOGY FOR APPROVAL. INDIVIDUAL UNIT SUBMITTALS (ENFORCEABLE AS INTERIM MILESTONES) WILL OCCUR AS SHOWN IN APPENDIX D.  PRECLOSURE WORK PLANS WILL BE PREPARED AND SUBMITTED FOR APPROVAL FOR TSD UNITS WHICH WILL ACHIEVE CLOSURE IN CONJUNCTION WITH THE DISPOSITION OF THE FACILITY IN WHICH THEY ARE CONTAINED.  COMPLIANCE WITH THE WORK SCHEDULES SET FORTH IN THIS M-20 SERIES IS DEFINED AS THE PERFORMANCE OF SUFFICIENT WORK TO ASSURE WITH REASONABLE CERTAINTY THAT DOE WILL ACCOMPLISH SERIES M-20 MAJOR AND INTERIM MILESTONE REQUIREMENTS.  DOE INTERNAL WORK SCHEDULES (E.G., DOE APPROVED SCHEDULE BASELINES) AND ASSOCIATED WORK DIRECTIVES AND AUTHORIZATIONS SHALL BE CONSISTENT WITH THE REQUIREMENTS OF THIS AGREEMENT. MODIFICATION OF DOE CONTRACTOR BASELINE(S) AND ISSUANCE OF ASSOCIATED DOE WORK DIRECTIVES AND/OR AUTHORIZATIONS THAT ARE	12/31/2008
	DITCH, 241-CX-70, 241-CX-71, AND 241-CX-72, 303-M OXIDE FACILITY AND 1706-KE WASTE TREATMENT SYSTEM.  M-020- SUBMIT CLOSURE/POST-CLOSURE PLANS FOR 216-A-10, 216-A-36B, 12/31/2008 216-A-37-1, 207-A SOUTH RETENTION BASIN, 216-S-10 POND, 216-	1200	FINALIZED PRIOR TO APPROVAL OF AN AGREEMENT CHANGE REQUEST SUBMITTED PURSUANT TO AGREEMENT ACTION PLAN SECTION 12.0.  SUBMIT PART B PERMIT APPLICATIONS OR CLOSURE/POST CLOSURE PLANS FOR ALL RCRA TSD UNITS EXCEPT 216-A-10, 216-A-36B, 216-	02/28/2004

### Modify Interim Milestone M-16-52 as follows:

Note: Struckout text indicates text to be deleted, shaded text indicates text to be added.

M-016-52	INITIATE RESPONSE ACTIONS FOR THE REMAINING WASTES SITES	07/31/2009
	FOR THE 100 K AREA INCLUDING CLOSURE OF THE 1706-KE WASTE	
	TREATMENT SYSTEM IN ACCORDANCE WITH SECTION 5.5 OF THE	
	AGREEMENT ACTION PLAN.	

#### Modify Appendix B to reflect the addition of the 1706-KE WTS to the 100-KR-2 Operable Unit.

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## Appendix B Listing of Treatment, Storage and Disposal Groups/Units

Treatment, Storage and Disposal		Planned Action			
Group Number	Group/Units	Operable Unit (if applicable)	Closure*	Operating Permit	
T-1-3**	1706-KE Treatment Facility (116-KE6 A-D):	100-KR-2	X		20
	1706-KE Waste Accumulation Tank 1706-KE ION Exchange Column 1706-KE Solidification Unit (Evaporator) 1706-KE Condensate Tank				

# Add the following 1706-KE Waste Treatment System waste sites to Operable Unit 100-KR-2 in Agreement Appendix C.

Waste Unit	Waste Unit Aliases	Unit Type	Status
100-KR-2	Ecology		
116-KE-6A**	116-KE-6A, 1706-KE Condensate Collection Tank, 1706-KE Waste Treatment System	Storage Tank	Explanation of Significant Difference for the 100 Area Remaining Sites Interim Action ROD
116-KE-6B**	116-KE-6B, 1706-KE Evaporation Tank, 1706-KE Waste Treatment System	Storage Tank	Explanation of Significant Difference for the 100 Area Remaining Sites Interim Action ROD
116-KE-6C**	116-KE-6C, 1706-KE Waste Accumulation Tank, 1706-KE Waste Treatment System	Storage Tank	Explanation of Significant Difference for the 100 Area Remaining Sites Interim Action ROD
116-KE-6D**	116-KE-6D, 1706-KE Ion Exchange Column, 1706-KE Waste Treatment System	Process Unit/Plant	Explanation of Significant Difference for the 100 Area Remaining Sites Interim Action ROD